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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
NORTHERN DIVISION

UNITED STATES OF AMERICA,

Case No. 22-CR-20187

Plaintiff,

Hon. Thomas L. Ludington  
United States District Judge

v.

Hon. Patricia T. Morris  
United States Magistrate Judge

D-1 RICARDO DELGADO II,  
D-2 GREGORY MARTIN HAYES,  
D-3 AUSTIN ANTONIO SAUCEDO,  
D-4 JONATHAN ORTIZ CORONADO,  
D-5 ARISTEO VINCENTE DELGADO,  
D-6 ADAM JUAN ROSAS,  
D-7 MICHAEL ALLAN PRATT,  
D-8 CHARLES ELLIS PARKS,  
D-9 JARQUAZE ANTHONY TOWNSEND,  
D-10 TEYANA LHAJUAN FRILLS, and  
D-11 ANTWON SHIVERS,

FILED  
MAY 04 2022  
U.S. DISTRICT COURT  
FLINT, MICHIGAN

Defendants.

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**FIRST SUPERSEDING INDICTMENT**

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**THE GRAND JURY CHARGES:**

**COUNT ONE**

**(21 U.S.C. §§ 846 and 841(a)(1))**

**Conspiracy to Possess with Intent to Distribute and to  
Distribute Cocaine**

**D-1 RICARDO DELGADO II,**

**D-2 GREGORY MARTIN HAYES,**  
**D-3 AUSTIN ANTONIO SAUCEDO,**  
**D-4 JONATHAN ORTIZ CORONADO,**  
**D-5 ARISTEO VINCENTE DELGADO, and**  
**D-6 ADAM JUAN ROSAS,**

From a date unknown to the Grand Jury, but since at least the fall of 2021, to on or about March 22, 2022, in the Eastern District of Michigan, RICARDO DELGADO II, GREGORY HAYES, AUSTIN SAUCEDO, JONATHAN CORONADO, ARISTEO DELGADO, and ADAM ROSAS knowingly conspired and agreed together and with other persons, both known and unknown to the grand jury, to possess with intent to distribute and to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1). The conspiracy as a whole involved five kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, all of which is attributable to each defendant as a result of their own individual conduct, and the conduct of other conspirators reasonably foreseeable to each of them.

All in violation of Title 21, United States Code, Sections 846 and 841(a)(1) and 841(b)(1)(A)(ii).

**Sentence Enhancement**  
**(21 U.S.C. §§ 841(b)(1)(A)(ii)(II))**

Before D-1 RICARD DELGADO committed the offense charged in this count, RICARDO DELGADO had two final convictions for serious drug felonies,

namely, a conviction under 21 U.S.C. §§ 846 and 841(a)(1), conspiracy to distribute a controlled substance, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense, and a conviction under 21 U.S.C. § 841(a), attempt to possess with intent to distribute 500 grams or more of cocaine, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

**Sentence Enhancement**  
**(21 U.S.C. §§ 841(b)(1)(A)(ii)(II))**

Before D-2 GREGORY HAYES committed the offense charged in this count, GREGORY HAYES had a final conviction for a serious drug felony, namely, a conviction under MCL 333.7401, Delivery/Manufacture 50-499 grams of cocaine, heroin, or other narcotic, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

**COUNT TWO**  
**(21 U.S.C. §§ 846 and 841(a)(1))**  
**Conspiracy to Possess with Intent to Distribute and to**  
**Distribute Cocaine**

**D-1 RICARDO DELGADO II,**  
**D-2 GREGORY MARTIN HAYES,**  
**D-7 MICHAEL ALLAN PRATT, and**  
**D-8 CHARLES ELLIS PARKS,**

From a date unknown to the Grand Jury, but since at least the fall of 2021, to on or about March 22, 2022, in the Eastern District of Michigan, RICARDO DELGADO II, GREGORY HAYES, MICHAEL PRATT, and CHARLES PARKS knowingly conspired and agreed together and with other persons, both known and unknown to the grand jury, to possess with intent to distribute and to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1). The conspiracy as a whole involved five hundred or more grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, all of which is attributable to each defendant as a result of their own individual conduct, and the conduct of other conspirators reasonably foreseeable to each of them.

All in violation of Title 21, United States Code, Sections 846 and 841(a)(1) and 841(b)(1)(B)(ii).

**Sentence Enhancement**  
**(21 U.S.C. §§ 841(b)(1)(A)(ii)(II))**

Before D-1 RICARD DELGADO committed the offense charged in this count, RICARDO DELGADO had two final convictions for serious drug felonies, namely, a conviction under 21 U.S.C. §§ 846 and 841(a)(1), conspiracy to distribute a controlled substance, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense, and a conviction under 21 U.S.C. § 841(a), attempt to possess with intent to distribute 500 grams or more of cocaine, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

**Sentence Enhancement**  
**(21 U.S.C. §§ 841(b)(1)(A)(ii)(II))**

Before D-2 GREGORY HAYES committed the offense charged in this count, GREGORY HAYES had a final conviction for a serious drug felony, namely, a conviction under MCL 333.74012A3, Delivery/Manufacture of 50-499 grams of cocaine, heroin, or other narcotic, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

**COUNT THREE**  
**(21 U.S.C. §§ 846 and 841(a)(1))**  
**Conspiracy to Possess with Intent to Distribute and to**  
**Distribute Cocaine**

**D-9 JARQUAZE ANTHONY TOWNSEND, and**  
**D-10 TEYANA LHAJUAN FRILLS,**

From a date unknown to the Grand Jury, but since at least the fall of 2021, to on or about May 5, 2022, in the Eastern District of Michigan, JARQUAZE TOWNSEND and TEYAN FRILLS knowingly conspired and agreed together and with other persons, both known and unknown to the grand jury, to possess with intent to distribute and to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1). The conspiracy as a whole involved five hundred grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, all of which is attributable to each defendant as a result of their own individual conduct, and the conduct of other conspirators reasonably foreseeable to each of them.

All in violation of Title 21, United States Code, Sections 846 and 841(a)(1) and 841(b)(1)(B)(ii).

**COUNT FOUR**

**(21 U.S.C. §§ 846 and 841(a)(1))**

**Conspiracy to Possess with Intent to Distribute and to  
Distribute Cocaine**

**D-9 JARQUAZE ANTHONY TOWNSEND, and  
D-11 ANTWON GEORGEDON SHIVERS,**

From a date unknown to the Grand Jury, but since at least the fall of 2021, to on or about May 5, 2022, in the Eastern District of Michigan, JARQUAZE TOWNSEND and ANTWON SHIVERS knowingly conspired and agreed together and with other persons, both known and unknown to the grand jury, to possess with intent to distribute and to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Sections 846 and 841(a)(1).

**COUNT FIVE**

**Possession with Intent to Distribute Cocaine  
(21 U.S.C. § 841(a)(1))**

**D-1 RICARDO DELGADO II**

On or about March 22, 2022, in the Eastern District of Michigan, Northern Division, RICARDO DELGADO II knowingly possessed with intent to distribute more than five kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(ii).

**Sentence Enhancement**  
**(21 U.S.C. §§ 841(b)(1)(A)(ii)(II))**

Before D-1 RICARDO DELGADO committed the offense charged in this count, RICARDO DELGADO had two final convictions for serious drug felonies, namely, a conviction under 21 U.S.C. §§ 846 and 841(a)(1), conspiracy to distribute a controlled substance, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense and a conviction under 21 U.S.C. § 841(a), attempt to possess with intent to distribute 500 grams or more of cocaine, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

**COUNT SIX**

**Possession of a firearm in furtherance of a drug trafficking crime**  
**(18 U.S.C. § 924(c)(1)(A))**

**D-1 RICARDO DELGADO II**

On or about March 22, 2022, in the Eastern District of Michigan, Northern Division, RICARDO DELGADO II, knowingly possessed a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, 21 U.S.C. § 841(a)(1), possession with intent to distribute cocaine;



in violation of 18 U.S.C. § 924(c)(1)(A).

**COUNT SEVEN**  
**Use of a Communication Facility**  
**(21 U.S.C. § 843(b))**

**D-1 RICARDO DELGADO II**

Beginning on a date unknown to the grand jury, but at least since the fall of 2021, and continuing at least until March 22, 2022, in the Eastern District of Michigan, Northern Division, RICARDO DELGADO II knowingly used and caused others to use a communication facility, that is a telephone, in committing, causing, and facilitating the commission of an act or acts constituting a felony under the Controlled Substances Act, that is, conspiracy to possess with intent to distribute and to distribute cocaine, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), as set forth in Counts One and Two of this indictment and incorporated by reference herein.

All in violation of Title 21, United States Code, Section 843(b).

**COUNT EIGHT**  
**Use of a Communication Facility**  
**(21 U.S.C. § 843(b))**

**D-2 GREGORY MARTIN HAYES**

Beginning on a date unknown to the grand jury, but at least since the fall of 2021, and continuing at least until March 22, 2022, in the Eastern District of Michigan, Northern Division, GREGORY HAYES knowingly used and caused others to use a communication facility, that is a telephone, in committing, causing, and facilitating the commission of an act or acts constituting a felony under the Controlled Substances Act, that is, that is, conspiracy to possess with intent to distribute and to distribute cocaine, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), as set forth in Counts One and Two of this indictment and incorporated by reference herein.

All in violation of Title 21, United States Code, Section 843(b).

**COUNT NINE**  
**Use of a Communication Facility**  
**(21 U.S.C. § 843(b))**

**D-3 AUSTIN ANTONIO SAUCEDO**

Beginning on a date unknown to the grand jury, but at least since the fall of 2021, and continuing at least until March 22, 2022, in the Eastern District of Michigan, Northern Division, AUSTIN SAUCEDO knowingly used and caused

others to use a communication facility, that is a telephone, in committing, causing, and facilitating the commission of an act or acts constituting a felony under the Controlled Substances Act, that is, conspiracy to possess with intent to distribute and to distribute cocaine, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), as set forth in Count One of this indictment and incorporated by reference herein.

All in violation of Title 21, United States Code, Section 843(b).

**COUNT TEN**  
**Use of a Communication Facility**  
**(21 U.S.C. § 843(b))**

**D-4 JONATHAN ORTIZ CORONADO**

Beginning on a date unknown to the grand jury, but at least since the fall of 2021, and continuing at least until March 22, 2022, in the Eastern District of Michigan, Northern Division, JONATHON CORONADO knowingly used and caused others to use a communication facility, that is a telephone, in committing, causing, and facilitating the commission of an act or acts constituting a felony under the Controlled Substances Act, that is, conspiracy to possess with intent to distribute and to distribute cocaine, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), as set forth in Count One of this indictment and incorporated by reference herein.

All in violation of Title 21, United States Code, Section 843(b).

**COUNT ELEVEN**  
**Use of a Communication Facility**  
**(21 U.S.C. § 843(b))**

**D-5 ARISTEO VINCENTE DELGADO**

Beginning on a date unknown to the grand jury, but at least since the fall of 2021, and continuing at least until March 22, 2022, in the Eastern District of Michigan, Northern Division, ARISTEO DELGADO knowingly used and caused others to use a communication facility, that is a telephone, in committing, causing, and facilitating the commission of an act or acts constituting a felony under the Controlled Substances Act, that is, conspiracy to possess with intent to distribute and to distribute cocaine, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), as set forth in Count One of this indictment and incorporated by reference herein.

All in violation of Title 21, United States Code, Section 843(b).

**COUNT TWELVE**  
**Use of a Communication Facility**  
**(21 U.S.C. § 843(b))**

**D-6 ADAM JUAN ROSAS**

Beginning on a date unknown to the grand jury, but at least since the fall of 2021, and continuing at least until March 22, 2022, in the Eastern District of Michigan, Northern Division, ADAM ROSAS knowingly used and caused others to use a communication facility, that is a telephone, in committing, causing, and facilitating the commission of an act or acts constituting a felony under the Controlled Substances Act, that is, conspiracy to possess with intent to distribute and to distribute cocaine, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), as set forth in Count One of this indictment and incorporated by reference herein.

All in violation of Title 21, United States Code, Section 843(b).

**COUNT THIRTEEN**  
**Use of a Communication Facility**  
**(21 U.S.C. § 843(b))**

**D-7 MICHAEL ALLAN PRATT**

Beginning on a date unknown to the grand jury, but at least since the fall of 2021, and continuing at least until March 22, 2022, in the Eastern District of Michigan, Northern Division, MICHAEL PRATT knowingly used and caused

others to use a communication facility, that is a telephone, in committing, causing, and facilitating the commission of an act or acts constituting a felony under the Controlled Substances Act, that is, conspiracy to possess with intent to distribute and to distribute cocaine, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), as set forth in Count Two of this indictment and incorporated by reference herein.

All in violation of Title 21, United States Code, Section 843(b).

**COUNT FOURTEEN**  
**Use of a Communication Facility**  
**(21 U.S.C. § 843(b))**

**D-8 CHARLES ELLIS PARKS**

Beginning on a date unknown to the grand jury, but at least since the fall of 2021, and continuing at least until March 22, 2022, in the Eastern District of Michigan, Northern Division, CHARLES PARKS knowingly used and caused others to use a communication facility, that is a telephone, in committing, causing, and facilitating the commission of an act or acts constituting a felony under the Controlled Substances Act, that is, conspiracy to possess with intent to distribute and to distribute cocaine, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), as set forth in Count Two of this indictment and incorporated by reference herein.

All in violation of Title 21, United States Code, Section 843(b).

**COUNT FIFTEEN**  
**Use of a Communication Facility**  
**(21 U.S.C. § 843(b))**

**D-9 JARQUAZE ANTHONY TOWNSEND**

Beginning on a date unknown to the grand jury, but at least since the fall of 2021, and continuing at least until March 22, 2022, in the Eastern District of Michigan, Northern Division, JARQUAZE TOWNSEND knowingly used and caused others to use a communication facility, that is a telephone, in committing, causing, and facilitating the commission of an act or acts constituting a felony under the Controlled Substances Act, that is, conspiracy to possess with intent to distribute and to distribute cocaine, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), as set forth in Count Three and Four of this indictment and incorporated by reference herein.

All in violation of Title 21, United States Code, Section 843(b).

**COUNT SIXTEEN**  
**Use of a Communication Facility**  
**(21 U.S.C. § 843(b))**

**D-10 TEYANA LHAJUAN FRILLS**

Beginning on a date unknown to the grand jury, but at least since the fall of 2021, and continuing at least until March 22, 2022, in the Eastern District of Michigan, Northern Division, TEYANA FRILLS knowingly used and caused others to use a communication facility, that is a telephone, in committing, causing, and facilitating the commission of an act or acts constituting a felony under the Controlled Substances Act, that is, conspiracy to possess with intent to distribute and to distribute cocaine base, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), as set forth in Count Three of this indictment and incorporated by reference herein.

All in violation of Title 21, United States Code, Section 843(b).

**COUNT SEVENTEEN**  
**Use of a Communication Facility**  
**(21 U.S.C. § 843(b))**

**D-11 ANTWON GEORGEDON SHIVERS**

Beginning on a date unknown to the grand jury, but at least since the fall of 2021, and continuing at least until March 22, 2022, in the Eastern District of Michigan, Northern Division, ANTWON SHIVERS knowingly used and caused



others to use a communication facility, that is a telephone, in committing, causing, and facilitating the commission of an act or acts constituting a felony under the Controlled Substances Act, that is, conspiracy to possess with intent to distribute and to distribute cocaine, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), as set forth in Count Four of this indictment and incorporated by reference herein.

All in violation of Title 21, United States Code, Section 843(b).

### **FORFEITURE ALLEGATIONS**

The allegations contained in Counts One through Seventeen of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture. Pursuant to Fed.R.Cr.P. 32.2(a), the government hereby gives notice to the defendants of its intention to seek forfeiture of all proceeds of the alleged violations, direct or indirect, or property traceable thereto; all property that facilitated the commission of the violations alleged, or property traceable thereto; all

property involved in, or property traceable to, the violations alleged in this Indictment.

Dated: May 4, 2022

**THIS IS A TRUE BILL**

s/GRAND JURY FOREPERSON

DAWN N. ISON  
United States Attorney

s/ANTHONY P. VANCE  
ANTHONY P. VANCE  
Assistant United States Attorney  
Chief, Branch Offices

s/TIMOTHY TURKELSON  
TIMOTHY TURKELSON  
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(P53748)

**Companion Case information MUST be completed by AUSA and initialed.**

United States District Court Eastern District of Michigan	<b>Criminal Case Cover Sheet</b>	<b>Case Number</b> 22-CR-20187
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

<b>Companion Case Information</b>	<b>Companion Case Number:</b>
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	<b>Judge Assigned:</b>
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b>AUSA's Initials:</b> TT

**Case Title:** USA v. RICARDO DELGADO, ET. AL.**County where offense occurred :** SAGINAW**Check One:** ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty**☐ Indictment/ ☐ Information --- no prior complaint.☐ Indictment/ ☐ Information --- based upon prior complaint [Case number: \_\_\_\_\_]☒ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].**Superseding Case Information****Superseding to Case No:** 22-CR-20187 **Judge:** Thomas L. Ludington

- ☐ Original case was terminated; no additional charges or defendants.
- ☐ Corrects errors; no additional charges or defendants.
- ☐ Involves, for plea purposes, different charges or adds counts.
- ☒ Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
ADAM ROSAS, MICHAEL PRATT, CHARLES PARKS, JARQUAZE TOWNSEND, TEYANA FRILLS, and ANTWON SHIVERS,		

**Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.**

May 4, 2022  
Date

s/TIMOTHY TURKELSON  
Timothy Turkelson  
Assistant United States Attorney  
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P53748

<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.